



TO

Name: Financial Assist. Po. Div, NRCS
 Location:
 Reason: Comments on Interim Rule
 FAX #: 202-720-4265
 Date: March 13, 2009
 Number of Pages (including this one): 5

FROM

Wild Farm Alliance
 FAX #: 831-761-8103
 Phone #: 831-761-8408

RECEIVED MAR 13 2009

FAX MESSAGE

Hello,
 Please see 4 attached pages

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Best,
 John

PO Box 2570, Watsonville, CA 95077

info@wildfarmalliance.org

**BOARD:****John Davis***Adirondack Council***Michael DiNunzio***Consulting Ecologist***Randall Gray***Wildlife Biologist***Dave Henson***Occidental Arts
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March 14, 2009

Financial Assistance Programs Division
 Wildlife Habitat Incentives Program Comments
 USDA Natural Resources Conservation Service
 P.O. Box 2890, Room 5237-S,
 Washington, DC 20013
 Fax: (202) 720-4265

**RE: COMMENTS ON WILDLIFE HABITAT INCENTIVES
 PROGRAM (WHIP)**

Dear NRCS Financial Assistance Programs Division,

Wild Farm Alliance promotes a healthy, viable agriculture that protects and restores wild Nature. Besides providing educational materials and addressing policy issues on a national level, we work with farmers installing conservation practices in California's Central Coast region. The following comments relate to WHIP as described in the Interim Final Rule:

- **National Priorities.** We agree with the chosen national priorities for WHIP of promoting the restoration of declining or important native fish and wildlife habitats; protecting, restoring, developing, or enhancing fish and wildlife habitat to benefit at-risk species.
- **Native Pollinators.** Because of WHIP's priorities above, we feel it should focus on "native" pollinators and their habitats and not "managed" pollinators which do not come under the definition of wildlife and can require non-native habitats to sustain them.
- **Ag Lands Definition.** The definition of agricultural lands should include areas other than just those "on which agricultural and forest related produced or livestock are produced." The farm is a system that benefits from and can support natural areas. Farm products are produced in conjunction with beneficial insects and predators that rely on habitat not in the current definition. In addition, with food safety becoming more and more of an concern, landscapes that help to filter pollution such as wetlands, riparian areas, streams, are a critical component of production and should be eligible for cost share payments.

Section 636.7 Cost-share Payments. We recommend that NRCS readily grant additional cost-share assistance beyond the standard 75 percent, as described: "The cost-share payment to a participant shall be reduced proportionately below 75 percent to the extent that direct Federal financial assistance is provided to the participant from sources other than NRCS,

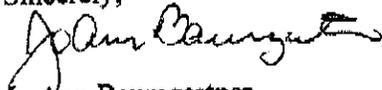
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except for certain cases that merit to achieve the intended goals of the program....”
We think this is especially important as it relates to rare species, since farmers do not benefit financially for these types of good works and would be more inclined to participate with stronger support.

- Stream Bottoms. We urge NRCS to allow the stream bottom in all states to be eligible for WHIP. Currently, the stream bottom in some states is not eligible for WHIP funding. Since these streams are integral parts of farming and ranching operations and provide critical habitat for many at-risk species, including instream habitat practices can protect the viability of the land for agricultural production.

Sincerely,



Jo-Ann Baumgartner
Director